

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA**

THE CITY OF HUNTINGTON,  
Plaintiff,

v.

Civil Action No. 3:17-01362

AMERISOURCEBERGEN DRUG  
CORPORATION, *et al.*,  
Defendants.

---

CABELL COUNTY COMMISSION,  
Plaintiff,

v.

Civil Action No. 3:17-01665

AMERISOURCEBERGEN DRUG  
CORPORATION, *et al.*,  
Defendants.

**PLAINTIFFS' NOTICE OF 30(b)(6) DEPOSITION OF  
THE HEALTHCARE DISTRIBUTION ALLIANCE**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 30(b)(6), and the Deposition Protocol governing this litigation, Plaintiffs the City of Huntington and Cabell County Commission, by and through undersigned counsel, hereby give notice that the oral videotaped deposition will be taken of one or more officers, directors, or managing agents, or other persons designated by the Healthcare Distribution Alliance, upon the particular topics identified in Attachment A to the Subpoena, attached hereto as Exhibit 1. The deposition will be held on **July 31, 2020 at 10:00 AM (Eastern Standard Time) remotely** or another date, time, and location to be determined at the mutual convenience of the parties.

The deposition shall be videotaped and recorded stenographically and will continue from day to day until completed before a person duly authorized to administer oaths who is not

counsel of record or interested in the events of this case. The oral examination is to be taken for purposes of discovery, for use at trial, or for such other purposes as are permitted under the Federal Rules of Civil Procedure, the local rules of the United States District Court for the Southern District of West Virginia, and all Pretrial Orders and Case Management Orders entered by the Court. Court reporting services and video recording services will be provided by Golkow Global Litigation Services. Parties who wish to attend may RSVP to the deposition by emailing [scheduling@golkow.com](mailto:scheduling@golkow.com).

Dated: June 23, 2020

Respectfully submitted,

THE CITY OF HUNTINGTON

CABELL COUNTY COMMISSION

/s/ Anne McGinness Kears

Anne McGinness Kears (WVSB No. 12547)

Joseph F. Rice

**MOTLEY RICE LLC**

28 Bridgeside Blvd.

Mount Pleasant, SC 29464

Tel: 843-216-9000

Fax: 843-216-9450

[akearse@motleyrice.com](mailto:akearse@motleyrice.com)

[jrice@motleyrice.com](mailto:jrice@motleyrice.com)

Linda Singer

David I. Ackerman

**MOTLEY RICE LLC**

401 9th Street NW, Suite 1001

Washington, DC 20004

Tel: 202-232-5504

Fax: 202-386-9622

[lsinger@motleyrice.com](mailto:lsinger@motleyrice.com)

[dackerman@motleyrice.com](mailto:dackerman@motleyrice.com)

Charles R. "Rusty" Webb (WVSB No. 4782)

**THE WEBB LAW CENTRE, PLLC**

716 Lee Street, East

Charleston, West Virginia 25301

Telephone: (304) 344-9322

Facsimile: (304) 344-1157

[rusty@rustywebb.com](mailto:rusty@rustywebb.com)

/s/ Paul T. Farrell, Jr.

Paul T. Farrell, Jr. (WVSB Bar No. 7443)

**FARRELL LAW**

P.O. Box 1180

Huntington, WV 25714-1180

422 Ninth Street, 3rd Floor

Huntington, West Virginia 25701

office: 304.523.7285

cell: 304.654.8281

email: [paul@farrell.law](mailto:paul@farrell.law)

Michael A. Woelfel (W.Va. Bar ID 4106)

**WOELFEL AND WOELFEL, LLP**

801 Eighth Street

Huntington, West Virginia 25701

304.522.6249

304.522.9282: fax

[mikewoelfel3@gmail.com](mailto:mikewoelfel3@gmail.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on July 23, 2020, PLAINTIFFS' NOTICE OF 30(b)(6) DEPOSITION OF THE HEALTHCARE DISTRIBUTION ALLIANCE was served on all counsel via email only to plaintiffs' listserv at [mdl2804discovery@motleyrice.com](mailto:mdl2804discovery@motleyrice.com) and defendants' listservs at [track2opioiddefendants@reedsmith.com](mailto:track2opioiddefendants@reedsmith.com).

/s/ Monique Christenson  
Monique Christenson (SC Bar No. 104063)  
Motley Rice LLC  
*On behalf of Plaintiffs*